

STEVEN T. JAFFE, ESQ.  
Nevada Bar No. 7035  
[sjaffe@lawhjc.com](mailto:sjaffe@lawhjc.com)  
ASHLIE L. SURUR, ESQ.  
Nevada Bar No. 11290  
[asurur@lawhjc.com](mailto:asurur@lawhjc.com)

**HALL, JAFFE & CLAYTON, LLP**

7425 Peak Drive  
Las Vegas, Nevada 89128  
(702) 316-4111  
Fax (702) 316-4114

*Attorneys for Lowe's Home Centers, LLC*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

CYNTHIA POZESKY, an Individual,

Plaintiff,

vs.

LOWE'S HOME CENTERS, LLC, a North  
Carolina Limited Liability Company; DOES I-  
X; and ROE BUSINESS ENTITIES XI-XX,  
inclusive,

Defendants.

Case No.: 2:18-cv-02270-APG-VCF

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO RESPOND  
TO PLAINTIFF CYNTHIA  
POZESKY'S MOTION TO REMAND  
[ECF NO. 13]  
(Second Request)**

The parties, by and through their attorneys of record, stipulate as follows:

1. On December 19, 2018, Plaintiff filed a Motion to Remand. ECF No. 13.

2. The current deadline to respond to the Motion to Remand [ECF No. 13] is

January 7, 2019, by extension. ECF No. 16.

3. After obtaining the first extension, counsel for Defendant Lowe's Home Centers, LLC was out of the office due to an illness and, as a result, Defendant Lowe's Home Centers,

1 LLC requires additional time to fully and fairly prepare its response to the issues raised in the  
2 Motion to Remand.

3 4. Accordingly, the parties agree there is good cause to extend the deadline to  
4 respond to the Motion to Remand [ECF No. 13] from January 7, 2019 to January 11, 2019.

5 Dated: January 7, 2019.

6 HALL JAFFE & CLAYTON, LLP

7 /S/Ashlie L. Surur

8 Steven T. Jaffe, Esq.

9 Nevada Bar No. 7035

10 Ashlie L. Surur, Esq.

11 Nevada Bar No. 11290

7425 Peak Drive

Las Vegas, Nevada 89128

*Attorneys for Lowe's Home Centers, LLC*

Dated: January 7, 2019.

CLAGGETT & SYKES LAW FIRM

/S/William Sykes

Sean K. Claggett, Esq.

Nevada Bar No. 8407

William T. Sykes, Esq.

Nevada Bar No. 9916

4101 Meadows Lane, Suite 100

Las Vegas, Nevada 89107

*Attorneys for Cynthia Pozesky*

12 **ORDER**

13 **IT IS SO ORDERED.**

14  
15 

16 UNITED STATES DISTRICT JUDGE

17 Dated: January 8, 2019.

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24

**Stipulation and Order to Extend Deadline to Respond to Plaintiff Cynthia Pozesky's Motion to Remand [ECF No. 13] (Second Request)** on the following parties by electronic transmission through the Court's electronic filing system (CM/ECF):

/s/Alexandria Raleigh  
An Employee of HALL JAFFE & CLAYTON, LLP